

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jason Goodman, Pro Se -Plaintiff	PRO SE
-against-	21-cv-10878-AT-JLC
Christopher E. Bouzy, Defendant	District Judge Analisa Torres
	Magistrate Judge James L. Cott

**VERIFIED
DEFENDANT’S RESPONSE TO MOTION FOR RECONSIDERATION,
ECF 250 and 251**

The *pro se* Defendant (undersigned) now comes to provide a response to Plaintiff Jason Goodman’s papers known as ECF 250 and 251.

Signed July 14th, 2023 (7/14/2023)

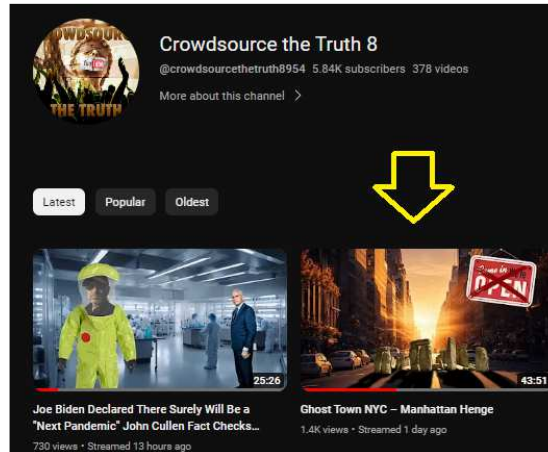


**D. G. SWEIGERT PRO SE DEFENDANT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

VERIFIED
DEFENDANT’S RESPONSE TO MOTION FOR RECONSIDERATION,
ECF 250 and 251

The Plaintiff Jason Goodman has now provided papers to this Court, ECF 250 and 251, that quibble about the characterization of Mr. Goodman as a “conspiracy theorist”, or “one that traffics in conspiracy theories”, etc. Mr. Goodman’s reputation as a “conspiracy theorist” is well deserved based on his conduct.

Mr. Goodman uses the aegis of the federal courts to submit papers which are a revisionist history of Mr. Goodman’s half decade experience pushing conspiracy theories on social media. In fact, in his latest social media podcast Mr. Goodman is touting his ECF 250 and 251 papers that he will discuss on his pay for view Patreon channel under his “COUNTER LAWFARE FUND”.



<https://www.youtube.com/@crowdsourcethetruth8954/streams>

Such social media promotion of revisionist court documents speaks to improper purpose, using “click-bait” sensational headlines to gather more “patrons” to Mr. Goodman’s pay for view profit video library at Patreon, LLC (a California company).

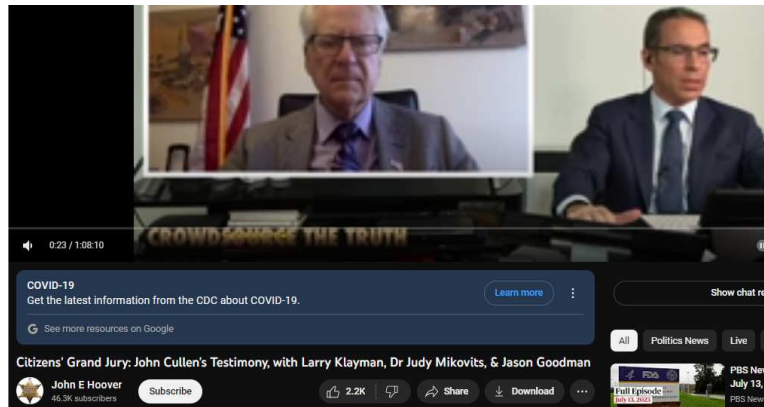
Background on Jason Goodman

Jason Goodman has spent years under the mentorship of some of the greatest minds in the conspiracy movement.

It is noteworthy that on several occasions Jason Goodman and CrowdSource the Truth (CSTT) sponsored joint podcasts with the conspiracy channel, hosted by Alex Jones, known as “INFOWARS”. This was a cross marketing arrangement. Mr. Goodman has had other such “one hand washes the other” social media collaborations with notorious Internet conspiracy personalities.

In an identical cross marketing arrangement, Mr. Goodman distributed 50 social media videos jointly produced with disbarred attorney Larry Klayman (for whom Goodman served as “Grand Jury Secretary” that “convicted” several federal judges of treason in a “Citizens Grand Jury”).

In fact, Larry Klayman was at the center of the controversy concerning Mr. Goodman’s violation of Judge Valerie E. Caproni’s, S.D.N.Y., protection order; “(5) an August 23, 2021, responsive email from Larry Klayman (who is an attorney); and (6) an August 23, 2021, response from Mr. Goodman to Mr. Klayman, which was copied to more than thirty email addresses, including Plaintiffs’ counsel and the confidential email address. See Dkt. 109-1; see also Dkt. 113 at Ex. A. In Mr. Goodman’s August 23, 2021, response to Mr. Klayman, Mr. Goodman explained that the goal of his 11:52 a.m. email had been to get the word out that Mr. Sweigert is “crazy without saying anything that he can allege is defamatory.” *Goodman v. Sharp*, 1:21-cv-10627-VEC (S.D.N.Y. Mar. 22, 2022). (<https://casetext.com/case/goodman-v-sharp-4>)



Premiered Jun 5, 2021 SUPREME COURT OF THE UNITED STATES

This is video evidence of a Citizen's Grand Jury hearing that took place on June 3, 2021. The testimony you are hearing is sworn testimony, and Grand Jurors are viewing the hearing in real time. The opinions expressed by the witnesses may not be fact, and certainly does not constitute advice of any kind. This is a hearing. A legal proceeding. Whether the content of the testimony is factual, is for the Grand Jury to decide.

<https://www.youtube.com/watch?v=FxWR-BjXZnk>

On OAN, Larry Klayman suggests a citizen's arrest of President Joe Biden

Klayman: "We will seek a sentence, and then we will seek to carry it out peacefully and legally, asking the military and the police to do it – and if they don't do it, we have a right of citizen's arrest in 48 states"

WRITTEN BY **MEDIA MATTERS STAFF**
PUBLISHED 10/06/22 11:43 AM EDT

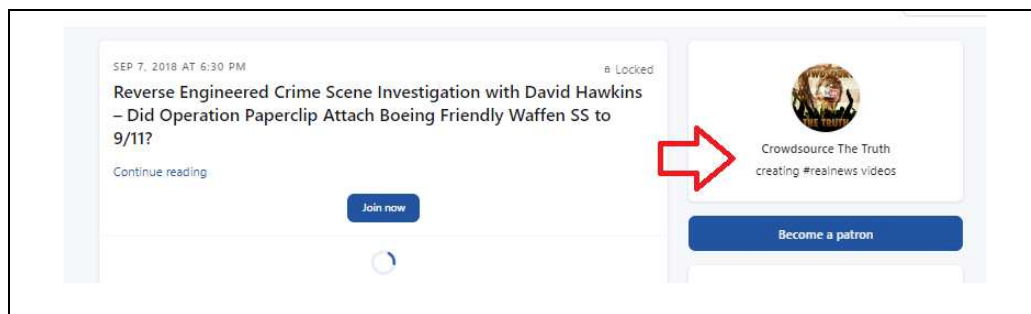
<https://www.mediamatters.org/one-america-news-network/oan-larry-klayman-suggests-citizens-arrest-president-joe-biden>

On August 13, 2018 Jenny Maire Moore, an “associate” of George Webb Sweigert, died in the same Capitol Heights, Maryland hotel in which George Webb was sleeping with his girlfriend, Corean Elizabeth Stoughton (who later became a Goodman associate). Mr. Goodman commenced a series of social media videos with his close associate “True Pundit”, aka Michael J. Moore (no relation) of West Chester, Pennsylvania, which pushed the conspiracy theory that Ms. Moore was murdered by Hillary Clinton pedophile operatives, as in a case of “Arkancide”. See Gateway Pundit article that exposes Mr. Moore, who completed about 50 joint broadcasts with Mr. Goodman

(<https://www.thedailybeast.com/pizzagate-pushers-death-drives-conspiracy-theorists-to-tout-her-as-new-seth-rich>) and (<https://www.buzzfeednews.com/article/craigsilverman/revealed-notorious-pro-trump-misinformation-site-true>).

In fact, in the fall of 2018, Mr. Goodman broadcasted a video of his telephone calls to the Prince George’s County Police, Maryland, implicating the undersigned in the “murder” of Ms. Moore, even though the autopsy report indicated Ms. Moore died of natural causes.

In another cross marketing agreement, in January 2019 Mr. Goodman started a series of 50 social media podcasts with debunked 911 conspiracy theorist David Charles Hawkins of South Surrey, White Rock, British Columbia, Canada (<https://www.patreon.com/posts/reverse-crime-ss-21270438>).



(<https://trackingmeroz.wordpress.com/2019/03/08/the-ouroboros-effect-jason-goodman-of-crowdsource-the-truth-with-david-hawkins-of-reverse-engineered-csi-storyboards/>)

Mr. Hawkins was the co-plaintiff in a legal action brought against of 100 defendants concerning 911 conspiracy theories. *McConnell v. Global Guardians*, 3:07-cv-00049, (D.N.D.) filed May 1, 2007. Defendants (including George W. Bush, Tom Ridge, George Soros, Hillary Clinton, Maurice Greenberg, Alexander M. Haig, Jr, etc.) were accused of planning the 911 World Trade Center attacks for financial gain. Undoubtedly, Mr. Goodman leaned the trade of filing meritless lawsuits for social media exposure from his years long partnership with Mr. Hawkins. In 2019 Mr. Hawkins and Mr. Goodman accused the undersigned of:

- Disengaging encryption of the Motorola public service radios at the World Trade Center on 9/11/2001 resulting in the death of 343 New York F.D.N.Y. fire fighters. Facts demonstrated those radios were not equipped with encryption.
- Assisting in the human trafficking of Hillary Clinton via the EVL Network at the University of Illinois, aka “BAT CAVE” and that the undersigned used this “EVL BAT CAVE” network to redirect aircraft into the World Trade Center.
- “Hacked” into the Vancouver, Canada Police Headquarters and destroyed evidence of Hillary Clinton’s involvement in the “Pig Farm Murders”, see Robert William "Willy" Pickton, British Columbia, arrested in 2002 as a serial rapist and murderer.



Is David Hawkins going to pull a Man-In-The-Middle Attack on his latest unsuspecting host?

(<https://trackingmeroz.wordpress.com/2019/02/02/the-strange-case-of-the-groundhog-loop-of-the-man-in-the-middle-attacker-david-hawkins/>)

In the words of Mr. Hawkins:



In 2019 Judge Caproni describes Jason Goodman pushing a conspiracy theory

The foregoing information was reviewed by Judge Caproni in the action, *Sweigert v. Goodman*, brought in 2018. The foregoing provides a summary of the allegations in that action, reviewed by Judge Caproni, that provides justification of Judge Caproni's characterization of Mr. Goodman as a "conspiracy theorist" who "traffics in conspiracy theories".

See "On the basis of Defendant's facially ridiculous statements on YouTube, which include, among other things, an accusation that Plaintiff used a microwave weapon to explode someone's lung," See *Sweigert v. Goodman*, ORDER, Case 1:18-cv-08653-VEC-SDA ECF 87 Page 2 of 14.

"Count Six of the amended complaint perhaps comes closest to pleading an injury, but it is still far afield. In Count Six, Plaintiff alleges wire fraud based on a YouTube video, in which Defendant spins a crackpot theory about Plaintiff surveilling an individual named Quinn Michaels and using a microwave weapon that caused Michaels to suffer an "explosion of a bleb attached to his lung." Id. at 30–31," See *Sweigert v. Goodman*, 1:18-cv-08653-VEC-SDA ECF 87 Page 8 of 14.

For example, Jason Goodman distributed training videos on how to modify household appliances (microwave) into so-called directed energy weapons (D.E.W.). In these videos Mr. Goodman claimed he had undeniable proof that put the undersigned at a Roswell, New Mexico hotel engaged in a murder plot against fellow conspiracy theorist Quinn Michaels. Goodman claimed that the undersigned modified the microwave oven in the hotel room adjacent to Michaels room to shoot a D.E.W. “Star Wars” beam into Michael’s hotel room, causing a bleb to explode in his lung. In a later video Goodman is seen explaining his theory to the surgeon that saved the life of Quinn Michaels, to which the physician replied “that is something out of Star Wars”. Undeterred Goodman advised the physician that Michaels was the subject of a murder plot with D.E.W., to which the medical doctor laughed and left the hospital room.



<https://burners.me/2019/11/14/jason-goodman-crippled-by-my-opening-legal-salvo/>

Setting aside the microwave D.E.W. “Star Wars” conspiracy theory, Goodman now claims Judge Caproni labeled him a conspiracy theorist because Goodman discovered in 2023 motivations of Judge Caproni in 2019. Mr. Goodman states “Goodman has alleged a conspiracy between defendants, Judge Caproni and now former FBI director James Comey (“Comey”). If Goodman’s allegations are true, Judge Caproni would be motivated to label him a “conspiracy theorist” despite the fact that the term has no legal definition and is tantamount to

a ruling determining Goodman is a moron.” at ECF 251 Page 2 of 10 [emphasis added]. Thus, Goodman admits that he is speculating about a “conspiracy theory”.

Goodman is wrong, “conspiracy theory” is a legal term of art

In law, a conspiracy theory is a theory of a case that presents a conspiracy to be considered by a trier of fact. The use of the term of art *conspiracy theory* is very common in the courts.

For example: (1) Dismissing complaint for lack of subject matter jurisdiction when complaint alleged a “bizarre *conspiracy theory*” in which the CIA killed plaintiff’s father after he decided to no longer assist the CIA in its assassinations and drug trafficking and portrayed the decedent as “Forrest Gump, popping up as a key player in virtually every prominent government conspiracy theory promulgated over the past 50 years”; *Carone-Ferdinand v. Central Intelligence Agency*, 131 F. Supp. 2d 232 (D.D.C. 2001); (2) Finding that “plaintiffs were unable to back their *conspiracy theory* with anything beyond conjecture and speculation”; *Hutchinson v. Staton*, 994 F.2d 1076 (4th Cir. 1993); (3) In Schwab, the Second Circuit adopted the Fourth Circuit’s test in *Unspam Techs., Inc. v. Chernuk*, 716 F.3d 322, 329 (4th Cir. 2013) for alleging a *conspiracy theory* of jurisdiction in a way that does not offend due process, *Charles Schwab Corp. v. Bank of Am. Corp.* 883 F.3d 68 (2d Cir. 2018).

A court dismissed a complaint as frivolous because “it appears that its claims relating to alleged government surveillance and harassment are of the sort of bizarre conspiracy theory that warrant dismissal under Rule 12(b)(1).” *Newby*, 681 F.Supp.2d at 56 (internal quotation marks omitted). *Walsh v. Hagee*, 900 F. Supp. 2d 51 (D.D.C. 2012).

Another case dismissing case under Fed. R. Civ. P. 12(b), where plaintiff alleged that two Senators were “involved in the irradiation of his brain and manipulation of his thought processes via devices surreptitiously implanted in his head”. The court stated that “[o]n its face,

the complaint appears to be the very type of 'bizarre conspiracy theory' that the D.C. Circuit has said warrants dismissal under Rule 12(b)(1)." Id. at 235. *Bestor v. Lieberman*, Civil Action No. 03-1470 (RWR) (D.D.C. Mar. 11, 2005)

Thus, the label "conspiracy theorist" or one "who traffics in conspiracy theories" is a fitting term characterizing Mr. Goodman's antics. This label will warn other unwitting persons, beguiled by Mr. Goodman's charming veneer, that deep down Mr. Goodman has a mind that can publish Tweets about the undersigned's father (see below).



<https://twitter.com/GHenryDickface>

SUMMARY

Jason Goodman has earned his reputation as one "who traffics in conspiracy theorirs", certainly not an "investigative journalist". The Court should leave its final judgment undisturbed in the matter regarding the use of "conspiracy theorist" to describe Jason Goodman and his CrowdSource The Truth "valuable" social media properties.

Certified under penalties of perjury.

Signed July 14th, 2023

A handwritten signature in black ink, appearing to read "D. S. J.", written in a cursive style.

PRO SE DEFENDANT

CERTIFICATE OF SERVICE

It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

truth@crowdsourcethetruth.org

And

Georg.webb@gmail.com

berlins@ballardspahr.com

mishkinm@ballardspahr.com

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liz.lockwood@alilockwood.com

Certified under penalties of perjury.

Signed July 14th, 2023



PRO SE DEFENDANT